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May 17, 2006

VIA ELECTRONIC FILING

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: MB Docket No. 03-15
WLIO-DT (Lima, Ohio)
Facility ID No. 37503
FCC File No. BMPCDT-20060517___
Request for Waiver of July 1, 2006 Replication/Maximization Deadline

Dear Ms. Dortch:

Lima Communications Corporation ("Lima"), permittee of WLIO-DT (Lima, Ohio) (the "Station"), by its attorneys, hereby respectfully requests waiver of the Commission's July 1, 2006 replication/maximization interference protection deadline. Due to circumstances beyond Lima's control, it cannot construct the Station's authorized facilities[1] prior to July 1st. Specifically, because of structure limitations ascertained upon re-evaluation of the existing NTSC tower, Lima will be unable to top mount the Station's DTV antenna as planned and instead must side-mount the antenna as proposed in the above-referenced construction permit application.[2]

Lima is filing this waiver request in an abundance of caution. Lima specified in its Form 381 Pre-Election Certification that its post-transition operations would be based upon "replication facilities,"[3] and, as reflected in the above-referenced construction permit application (copy attached), the proposed DTV service area easily encompasses the NTSC Grade B service

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1 *See* FCC File No. BMPCDT-20041201BCP.

2 In the event the above-referenced construction permit application is not granted in time for Lima to implement such facilities by the July 1st deadline, Lima hereby requests extension of the Station's existing STA (FCC File No. BEDSTA-20051021ABA), which the Commission said it would extend automatically (*See* DTV Channel Election Issues, *Public Notice*, DA 05-1636 (rel. June 15, 2005) ("*Public Notice*")).

3 *See* FCC File No. BCERCT-20041104ABJ.

area.[4] Accordingly, Lima believes the proposed facilities are consistent with its certified "replication facilities."

The Commission has a freeze on the filing of "expansion" applications,[5] however, and the Station thus may not increase the proposed power above a certain level so as to contain the proposed service area within that authorized. Accordingly, due to the contour deformities of operating a side-mounted antenna, the proposed service area population is less than that associated with the Station's existing DTV allotment.[6] As such, notwithstanding the fact that the Station's proposed service area population is more than twice that of the NTSC Grade B service area population, if the Commission were to apply the currently allotted DTV parameters as the baseline for "replication," then the proposed facilities would result in a service area population shortfall, thus necessitating a waiver.

Accordingly, in an abundance of caution, Lima hereby requests waiver of the July 1, 2006 replication/maximization interference protection deadline. Lima submits that this waiver request satisfies the standards set forth in the Commission's *Public Notice*.[7] Although the Station is prevented from operating at this time with a top-mounted antenna, it nonetheless still will provide service beyond the NTSC Grade B contour. All persons receiving the Station's analog signal still would receive the Station's digital signal. Indeed, the proposed increase in service is substantial, with the Station's DTV service reaching 910,391 persons compared to the existing NTSC service area population of 426,796.[8]

In its *Second DTV Periodic Review Report and Order*,[9] the Commission adopted a July 1, 2006 replication/maximization interference protection deadline for all DTV licensees not subject to the July 1, 2005 deadline. The Commission stated that, in cases where a station was unable to meet the applicable deadline due to "circumstances beyond a station's control," it would "grant extensions of the applicable replication or maximization interference protection deadline on a six-month basis if good cause is shown."[10] To receive such a waiver, broadcasters were required

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4 *See* Exhibit E-4 of the above-referenced construction permit application.

5 *See* Freeze on the Filing of Certain TV and DTV Requests for Allotment or Service Area Changes, *Public Notice*, DA 04-2446 (Aug. 3, 2004).

6 The Station obtained a channel change pursuant to rulemaking, and the Commission accordingly modified the DTV allotment's associated parameters (which are reflected in the current construction permit). *See Lima, Ohio*, MM Docket 01-51, *Report and Order*, 16 FCC Rcd 10935 (2001).

7 *Public Notice* at 3. The *Public Notice* applied to requests for waiver of the July 1, 2005 replication/maximization deadline applicable to stations in the top 100 markets affiliated with the top 4 networks. Lima understands, however, that similar standards will apply to requests for waiver of the July 1, 2006 replication/maximization deadline.

8 *See* Exhibit E-4 of the above-referenced construction permit application.

9 Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, *Report and Order*, 19 FCC Rcd 18279 (rel. Sept. 7, 2004) ("*Report and Order*").

10 *Id.*, ¶ 87. See also *Public Notice*.

to make a showing "similar to that required to obtain a waiver of the DTV construction deadlines."[11]

In its June 14, 2005 *Public Notice*, the Commission recognized that certain stations, although unable to reach 100% maximization or replication, nevertheless would be able to come close to meeting the applicable coverage requirements – and the Commission specifically cited the example of coverage shortfalls due to the use of side-mounted DTV antennas.[12] The Commission requested that stations submit the following information in conjunction with any request for waiver: "(1) how close to full replication/maximization the station will be as of the deadline; (2) the reason the station is unable to fully comply; (3) the cost to the station and the impact on viewers if the station were required to fully comply; (4) whether the station will be able to modify its operation to fully comply after analog operation terminates (*e.g.*, relocate their DTV antenna to the top of the tower); and (5) any other relevant factors."[13]

Lima responds to these specific inquiries as follows: (1) the proposed operations will reach 213% of the Grade B service area population and 91.1% of the construction permit service area population;[14] (2) the Station is prevented from operating as authorized in its current construction permit because it cannot top mount its DTV antenna during the transition as anticipated; (3) N/A; and (4) it is unknown at this time whether circumstances will permit the Station to top-mount the DTV antenna post-transition; and (5) the Station serves one of the smallest markets in the country (DMA #194), the market area is entirely encompassed by the proposed service area, and all those capable of receiving the Station's NTSC signal will receive the DTV signal.

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11 *Report and Order*, ¶ 87.

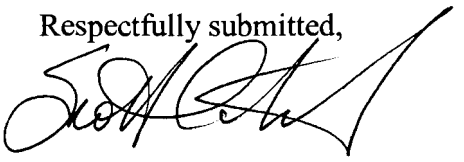
12 *Public Notice* at 3. The *Public Notice* applied to requests for waiver of the July 1, 2005 replication/maximization deadline applicable to stations in the top 100 markets affiliated with the top 4 networks. Paxson understands, however, that similar standards will apply to requests for waiver of the July 1, 2006 replication/maximization deadline.

13 *Id.*

14 Specifically, the predicted service area population resulting from the facilities authorized in FCC File No. BMPCDT-20041201BCP is 998,812.

Based upon the foregoing, Lima believes that it has shown good cause for the Commission to grant waiver of the July 1, 2006 deadline for the Station. Should any questions arise, please contact the undersigned.

Respectfully submitted,



Scott S. Patrick

cc: Shaun Maher (FCC)

ATTACHMENT

Construction Permit Application
FCC File No. BMPCDT-20060517___

Federal Communications Commission Washington, D.C. 20554	Approved by OMB 3060-0027 (September 2004)	FOR FCC USE ONLY
FCC 301		
APPLICATION FOR CONSTRUCTION PERMIT FOR COMMERCIAL BROADCAST STATION Read INSTRUCTIONS Before Filling Out Form		FOR COMMISSION USE ONLY FILE NO. -

Section I - General Information

1.	Legal Name of the Applicant LIMA COMMUNICATIONS CORPORATION			
	Mailing Address 1424 RICE AVENUE			
	City LIMA		State or Country (if foreign address) OH	ZIP Code 45805 -
	Telephone Number (include area code) 4192288835		E-Mail Address (if available)	
	FCC Registration Number:	Call Sign WLIO-DT	Facility ID Number 37503	
2.	Contact Representative (if other than Applicant) SCOTT PATRICK, ESQ.		Firm or Company Name DOW LOHNES PLLC	
	Telephone Number (include area code) 2027762000		E-Mail Address (if available) SPATRICK@DOWLOHNES.COM	

3. If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114):
○ Governmental Entity ○ Other
○ N/A (Fee Required)

4. **Application Purpose**

○ New station	○ Major Modification of construction permit
○ Major Change in licensed facility	◉ Minor Modification of construction permit
○ Minor Change in licensed facility	○ Major Amendment to pending application
	○ Minor Amendment to pending application
(a) File number of original construction permit:	BMPCDT-20041201BCP ☐ NA
(b) Service Type:	○ AM ○ FM ○ TV ◉ DTV
(c) Community of License: City: LIMA	State: OH
(d) Facility Type	◉ Main ○ Auxiliary
If an amendment, **submit as an Exhibit** a listing by Section and Question Number the portions of the pending application that are being revised.	[Exhibit 1]

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

Section II - Legal

1.	**Certification.** Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth	◉ Yes ○ No

	in the application instructions and worksheets.	
2.	**Parties to the Application.** a. List the applicant, and, if other than a natural person, its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. If a corporation or partnership holds an attributable interest in the applicant, list separately its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. Create a separate row for each individual or entity. Attach additional pages if necessary. (1) Name and address of the applicant and each party to the application holding an attributable interest (if other than individual also show name, address and citizenship of natural person authorized to vote the stock or holding the attributable interest). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and other entities with attributable interests, and partners. (2) Citizenship. (3) Positional Interest: Officer, director, general partner, limited partner, LLC member, investor/creditor attributable under the Commission's **equity/debt plus** standard, etc. (4) Percentage of votes. (5) Percentage of total assets (equity plus debt). [Enter Parties/Owners Information] b. Applicant certifies that equity and financial interests not set forth above are non-attributable.	○ Yes ○ No ○ N/A See Explanation in [Exhibit 2]
3.	**Other Authorizations.** List call signs, locations, and facility identifiers of all other broadcast stations in which applicant or any party to the application has an attributable interest.	☐ N/A [Exhibit 3]
4.	**Multiple Ownership.** a. Is the applicant or any party to the application the holder of an attributable radio joint sales agreement or an attributable radio or television time brokerage agreement in the same market as the station subject to this application? If "YES," radio applicants must submit as an Exhibit a copy of each such agreement for radio stations. b. Applicant certifies that the proposed facility complies with the Commission's multiple ownership rules and cross-ownership rules. Radio applicants only: If "Yes," submit an Exhibit providing information regarding the market, broadcast station(s), and other information necessary to demonstrate compliance with 47 C.F.R. § 73.3555(a). All Applicants: If "No," submit as an Exhibit a detailed explanation in support of an exemption from, or waiver of, 47 C.F.R. § 73.3555. c. Applicant certifies that the proposed facility: 1. does not present an issue under the Commission's policies relating to media interests of immediate family members; 2. complies with the Commission's policies relating to future ownership interests; and 3. complies with the Commission's restrictions relating to the insulation and non-participation of non-party investors and creditors.	○ Yes ◉ No [Exhibit 4] ◉ Yes ○ No [Exhibit 5] ◉ Yes ○ No See Explanation in [Exhibit 6]
5.	**Character Issues.** Applicant certifies that neither applicant nor any party to the application has or has had any interest in or connection with: a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or b. any pending broadcast application in which character issues have been raised.	○ Yes ○ No See Explanation in [Exhibit 7]
6.	**Adverse Findings.** Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another government unit; or discrimination.	○ Yes ○ No See Explanation in [Exhibit 8]

7.	**Alien Ownership and Control.** Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.	○ Yes ○ No See Explanation in [Exhibit 9]
8.	**Program Service Certification.** Applicant certifies that it is cognizant of and will comply with its obligations as a commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.	○ Yes ○ No
9.	**Local Public Notice.** Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.	○ Yes ○ No
10.	**Auction Authorization.** If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable. **An exhibit is required unless** this question is inapplicable.	○ Yes ○ No ○ N/A [Exhibit 10]
11.	**Anti-Drug Abuse Act Certification.** Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	◉ Yes ○ No
12.	**Equal Employment Opportunity (EEO).** If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.	○ Yes ○ No ○ N/A

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing BRUCE OPPERMAN	Typed or Printed Title of Person Signing PRESIDENT
Signature	Date

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III-D - DTV ENGINEERING DATA

Complete Questions 1-5 of the Certification Checklist and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.

Certification Checklist: A correct answer of "Yes" to all of the questions below will ensure an expeditious grant of a construction permit. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.

1.	The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:	
	(a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622.	◉ Yes ○ No
	(b) It will operate form a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this location as established in 47 C.F.R. Section 73.622.	◉ Yes ○ No
	(c) It will operate with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622.	◉ Yes ○ No
2.	The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. Applicant must **submit the Exhibit** called for in Item 13.	◉ Yes ○ No
3.	Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community.	◉ Yes ○ No

4.	The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable.	(•) Yes ( ) No
5.	The antenna structure to be used by this facility has been registered by the Commission and will not require registration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7.	(•) Yes ( ) No

SECTION III-D - DTV Engineering

TECHNICAL SPECIFICATIONS
Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1.	Channel Number: DTV 8 Analog TV, if any 35		
2.	Zone: (•) I ( ) II ( ) III		
3.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 40 Minutes 44 Seconds 51 (•) North ( ) South Longitude: Degrees 84 Minutes 7 Seconds 54.5 (•) West ( ) East		
4.	Antenna Structure Registration Number: 1014519 [ ] Not Applicable [ ] Notification filed with FAA		
5.	Antenna Location Site Elevation Above Mean Sea Level:	265.2	meters
6.	Overall Tower Height Above Ground Level:	167.3	meters
7.	Height of Radiation Center Above Ground Level:	138.8	meters
8.	Height of Radiation Center Above Average Terrain :	148	meters
9.	Maximum Effective Radiated Power :	27.5	kW
10.	Antenna Specifications: a. Manufacturer ERI Model ETH-CH10-8 b. Electrical Beam Tilt: 1 degrees [ ] Not Applicable c. Mechanical Beam Tilt: degrees toward azimuth degrees True [✓] Not Applicable Attach as an Exhibit all data specified in 47 C.F.R. Section 73.685. [Exhibit 40] d. Polorization: (•) Horizontal ( ) Circular ( ) Elliptical e. Directional Antenna Relative Field Values: [ ] Not applicable (Nondirectional) [For a composite directional (not off-the-shelf) antenna, press the following button to fill in the relative field values		

subform.]
[Relative Field Values]

10e. Directional Antenna Relative Field Values

[Fill in this subform for a composite directional (not off-the-shelf) antenna, only.]

e. Directional Antenna Relative Field Values:

Rotation (Degrees): ☑ No Rotation

Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value
0	0.94	10	0.982	20	1	30	0.982	40	0.94	50	0.901
60	0.884	70	0.884	80	0.901	90	0.94	100	0.982	110	1
120	0.982	130	0.94	140	0.901	150	0.884	160	0.884	170	0.901
180	0.94	190	0.982	200	1	210	0.982	220	0.94	230	0.901
240	0.884	250	0.884	260	0.901	270	0.94	280	0.982	290	1
300	0.982	310	0.94	320	0.901	330	0.884	340	0.884	350	0.901
Additional Azimuths											

Relative Field Polar Plot

If a directional antenna is proposed, the requirements of 47 C.F.R. Sections 73.625(c) must be satisfied. **Exhibit required.** [Exhibit 41]

11. Does the proposed facility satisfy the interference protection provisions of 47 C.F.R. Section 73.623(a)? (Applicable only if **Certification Checklist** items 1(a), (b), or (c) are answered "No".) ◉ Yes ○ No

[Exhibit 42]

If No, attach as an Exhibit justification therefore, including a summary of any previously granted waivers.

12. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefore. (Applicable only if **Certification Checklist** item 3 is answered "No.") [Exhibit 43]

13. **Environmental Protection Act. Submit in an Exhibit** the following: [Exhibit 44]

If **Certification Checklist** Item 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.

By checking "Yes" to **Certification Checklist** Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R Section 1.1311.

PREPARERS CERTIFICATION ON SECTION III MUST BE COMPLETED AND SIGNED.

SECTION III - PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name MARTIN R. DOCZKAT		Relationship to Applicant (e.g., Consulting Engineer) CONSULTING ENGINEER
Signature		Date 5/9/2006
Mailing Address COHEN, DIPPELL AND EVERIST, P.C. 1300 L STREET NW, SUITE 1100		
City WASHINGTON	State or Country (if foreign address) DC	Zip Code 20005 -
Telephone Number (include area code) 2028980111	E-Mail Address (if available) CDE@ATTGLOBAL.NET	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibits

Exhibit 40
Description: SEE EXHIBIT E-2

Attachment 40

Exhibit 41
Description: SEE EXHIBIT E-2

Attachment 41

Exhibit 44
Description: COMPREHENSIVE TECHNICAL EXHIBIT (EXHIBIT E)

REQUEST FOR WAIVER OF JULY 1ST BUILD-OUT DEADLINE EXPLAINING NECESSITY OF THIS INSTANT MODIFICATION APPLICATION

Attachment 44

Description
COMPREHENSIVE TECHNICAL EXHIBIT
REQUEST FOR WAIVER OF JULY 1 BUILD-OUT DEADLINE

EXHIBIT E

ENGINEERING STATEMENT
RE MODIFICATION OF CONSTRUCTION PERMIT
(FCC FILE NO. BMPCDT-20041201BCP)
ON BEHALF OF
LIMA COMMUNICATIONS CORPORATION
WLIO-DT, LIMA, OHIO
CHANNEL 8 27.5 KW ERP 148 METERS HAAT

MAY 2006

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President, Secretary and Treasurer of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.

Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

Subscribed and sworn to before me this 9th day of May, 2006.

Notary Public

My Commission Expires: 2/28/2008

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

Martin R. Doczkat being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer of the Pennsylvania State University, and is a staff engineer at Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.

Martin R. Doczkat

Subscribed and sworn to before me this 9th day of May, 2006.

Notary Public

My Commission Expires: 2/28/2008

Introduction

This engineering statement has been prepared on behalf of Lima Communications Corporation, licensee of WLIO(TV). The purpose of this engineering statement is to accompany its request for modification of construction permit (FCC File No. BMPCDT-20041201BCP). Included with this report are the exhibits referred to in this text along with FCC Form 301, Section III-D.

Lima Communications Corporation operates television station WLIO(TV) on NTSC Channel 35 with a maximum visual effective radiated power ("ERP") of 661 kW (horizontal polarization) and an antenna height above average terrain ("HAAT") of 165 meters (541 feet). Lima Communications Corporation has been allocated DTV Channel 20 with facilities of 50 kW ERP at an HAAT of 165 meters in the revised DTV Table of Allotments[1], but was granted in a rulemaking to replace its DTV Channel 20 with DTV Channel 8 (FCC File No. BPRM-20000728AAG). Lima Communications Corporation now proposes to modify its currently authorized DTV facilities in its outstanding construction permit to 27.5 kW ERP (horizontal polarization) on Channel 8 at an HAAT of 148 meters.

WLIO-DT Tower

The DTV antenna will be side-mounted on an existing tower having a total overall structure height above ground of 167.3 meters. The existing transmitter site is located at 1424 Rice Avenue, Lima, Ohio. The tower has been registered under the number 1014519.

The geographic coordinates of the existing tower are as follows:

[1] "In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service", MM Docket No. 87-286, Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order. (FCC 98-24), 2/12/98, DTV Table of Allotments (Pg. B-43).

North Latitude: 40° 44' 51"

West Longitude: 84° 07' 54.5"

NAD-27

Equipment Data

An ERI, Type ETH-CH10-8 (or equivalent) antenna, with 1.0° electrical beam tilt will be installed. The vertical plane pattern and other exhibits required by Section 73.625(c) are included in Exhibit E-2.

Power Data

Transmitter Power Output	3.2 kW	5.05 dBk
Transmission Line Loss (485 ft. of ERI HJ8-50 3" Air Heliax)	80.16%	0.96 dB
Input Power to Antenna	2.57 kW	4.09 dBk
Antenna Power Gain	10.71	10.30 dB
Effective Radiated Power	27.5 kW	14.39 dBk

Elevation Data

(Existing Tower; No Change in Overall Height)

Elevation of site above mean sea level	265.2 meters (870 feet)
Overall height above ground of the existing antenna structure (including beacon)	167.3 meters (549 feet)
Overall height above mean sea level of existing tower (including beacon)	432.5 meters (1419 feet)
Center of radiation of Channel 8 antenna above ground	138.8 meters (455.5 feet)

Center of radiation of Channel 8 antenna above mean sea level	404 meters (1325.5 feet)
Antenna height above average terrain	148 meters

Note: Slight height differences result due to conversion to metric.

Allocation

An allocation study from the proposed site has not been performed since the proposed DTV facilities will not extend the replicated service area in every direction (see Exhibit E-4) as the effective radiated power authorized for the WLIO-DT facilities in its outstanding construction permit (FCC File No. BMPCDT-20041201BCP).

Coverage

WLIO-DT transmission facilities are located within the city limits. However, a coverage map (Exhibit E-3) has been provided which shows the proposed F(50,90) City Grade 43 dBu and Noise-Limited 36 dBu contours. Further, Exhibit E-4 demonstrates that the proposed F(50,90) 36 dBu contour does not extend in any direction beyond that currently authorized by the outstanding construction permit.

Other Licensed and Broadcast Facilities

There are no AM stations within 3.22 km of the existing WLIO(TV) tower site. There are no FM broadcast stations operating within 300 meters of the existing site. The only other TV broadcast station to operate within 300 meters of the site is WLIO(TV). WLIO(TV) operates at the proposed the transmitter site.

No adverse technical effect is anticipated by the proposed DTV operation to any other FCC licensed facility. If required, the licensee of WLIO-DT will install filters or take other measures as necessary to resolve the problem.

Radio Frequency Field Level

The DTV antenna will be side-mounted on the existing tower with 138.8 meters radiation center above ground level. WLIO(TV) is the only broadcast station which currently operates at the site. The following non-broadcast facilities are also licensed to transmit from the tower:

KPH703 WPLP548

Pursuant to OET Bulletin No. 65, dated August 1997, these non-broadcast stations are all exempt from radio frequency field ("RFF") level evaluations for the following reason:

Station	Licensed Under Part No.	Reason for Exemption
KPH703	Part 74, Subpart D	Subpart D Exempt
WPLP548	Part 74, Subpart D	Subpart D Exempt

Therefore, the RFF study will consider the following stations:

WLIO(TV)	Channel 35
WLIO-DT	Channel 8

The RFF radiation contribution of each station will be calculated using the following formula:

$$S = \frac{33.4(F^2)\ \text{Total ERP}}{R^2}$$

where:

S = power density in μW/cm²
F = relative field factor
Total ERP = ERP Horizontal Polarization + ERP Vertical Polarization
R = RCAGL - 2 meters

ERP = RMS ERP in watts for DTV Stations

$ERP = [0.4ERP_V + ERP_A]$ for NTSC Stations
ERP_V = peak visual ERP in watts
ERP_A = RMS aural ERP in watts

WLIO(TV) NTSC Facility

Channel 35	Freq:	596-602 MHz Range
	ERP =	(0.4)[661,000 watts (visual)] + [66,100 watts (aural)]
	Polarization =	Horizontal
	RCAGL -2 meters =	156.8 meters

WLIO(TV) is using an RCA TFU-30JA antenna with 0.5° electrical beam tilt. The manufacturer's vertical plane pattern indicates that the relative field factor will be less than 0.2 at any angle greater then 5 degrees below the horizon. A value of 0.2 will be used in the calculation.

$$S = \frac{33.4\ (F^2)\ \text{Tot ERP}}{R^2}$$

Tot ERP = 330,500 watts (Horizontal Only)
R = 156.8 meters
F = 0.2 (field factor)

S= 18.0 uW/cm² S = 0.018 mW/cm²

WLIO(TV) contributes less than 0.018 mW/cm² at 2 meters above the ground. The limit for an uncontrolled environment is f/1500 for a station broadcasting on 599 MHz.

(599 MHz)/1500 = 0.399 mW/cm² is the RFF limit for WLIO(TV)

Therefore:

WLIO(TV) NTSC facility contributes less than 4.5% RFF for an uncontrolled environment two meters above the ground at the tower site.

WLIO-DT DTV Facility

Channel 8	Freq:	180-186 MHz Range
	ERP =	27,500 watts
	Polarization =	Horizontal
	RCAGL - 2 meters =	136.8 meters

WLIO-DT proposes to utilize an ERI, ETH-CH10-8 antenna with 1.0°electrical beam tilt. The manufacturer's vertical plane pattern is included in Exhibit E-2. Based on this plot, the field factor will be less then 0.25 at any angle greater than 6 degrees below the horizon. A value of 0.25 will be used in the calculation.

$S = \frac{33.4 (F^2) \text{ Tot ERP}}{R^2}$ Tot ERP = 27,500 watts–Average (Horizontal Only)
R = 136.8 meters
F = 0.25 (field factor)

$S = 3.1 \text{ uW/cm}^2$ $S = 0.0031 \text{ mW/cm}^2$

Therefore WLIO-DT contributes less than 0.0031 mW/cm^2 at 2 meters above the ground. The limit for an uncontrolled environment is 200 $\mu W/cm^2$ for a station broadcasting in the 180-186 MHz range.

Therefore:

WLIO-DT's proposed DTV facility will contribute less than 1.5% RFF for an uncontrolled environment two meters above the ground at the tower site.

Total RFF at the Site

The total RFF contribution of all transmitters can now be calculated:

Total RFF = WLIO(TV) RFF% + WLIO-DT RFF%

Total RFF = 4.5% + 1.5% Total RFF = 6.0%

Therefore, all facilities contribute less than 6.0% RFF for an uncontrolled environment, which is less than approximately 1.2% RFF for a controlled environment, 2 meters above the ground at the tower site.

The tower site is located inside a chain link fence with a locked gate to prevent unauthorized access to the tower.

Finally, provisions will be made to reduce power or to terminate the transmitter emissions as appropriate when it is necessary for authorized personnel to climb the tower. All facilities operating on the tower will coordinate to ensure that workers will not be subjected to RFF levels in excess of the current FCC guidelines listed in OET Bulletin No. 65, dated August 1997 and Supplement A.

Environmental Assessment

An environmental assessment ("EA") is categorically excluded under Section 1.1306 of the FCC Rules and Regulations as the tower was constructed prior to the requirements specified in WT Docket No. 03-128 and the permittee indicates:

(a)(1)	The existing tower is not located in an officially designated wilderness area.
(a)(2)	The existing tower is not located in an officially designated wildlife preserve.
(a)(3)	The proposed facilities will not affect any listed threatened or endangered species or habitats.
(a)(3)(ii)	The proposed facilities will not jeopardize the continued existence of any proposed endangered or threatened species or likely to result in the destruction or adverse modification of proposed critical habitats.

(a)(4) The proposed facilities located on a tower which was built prior to the adoption of WT Docket No. 03-128 and is grandfathered and has not affected any known districts, sites, buildings, structures, or objects significant in American history, architecture, archaeology, engineering, or culture.

(a)(5) The existing tower is not located near any known Indian religious sites.

(a)(6) The existing tower is not located in a flood plain.

(a)(7) The installation of the DTV facilities on an existing guyed tower will not involve a significant change in surface features of the ground in the vicinity of the tower.

(a)(8) It is not proposed to equip the tower with high intensity white lights unless required by the FAA.

(b) Workers and the general public will not be subjected to RFF levels in excess of the current FCC guidelines contained in OET Bulletin No. 65, Edition 97-01, dated August 1997 and Supplement A.

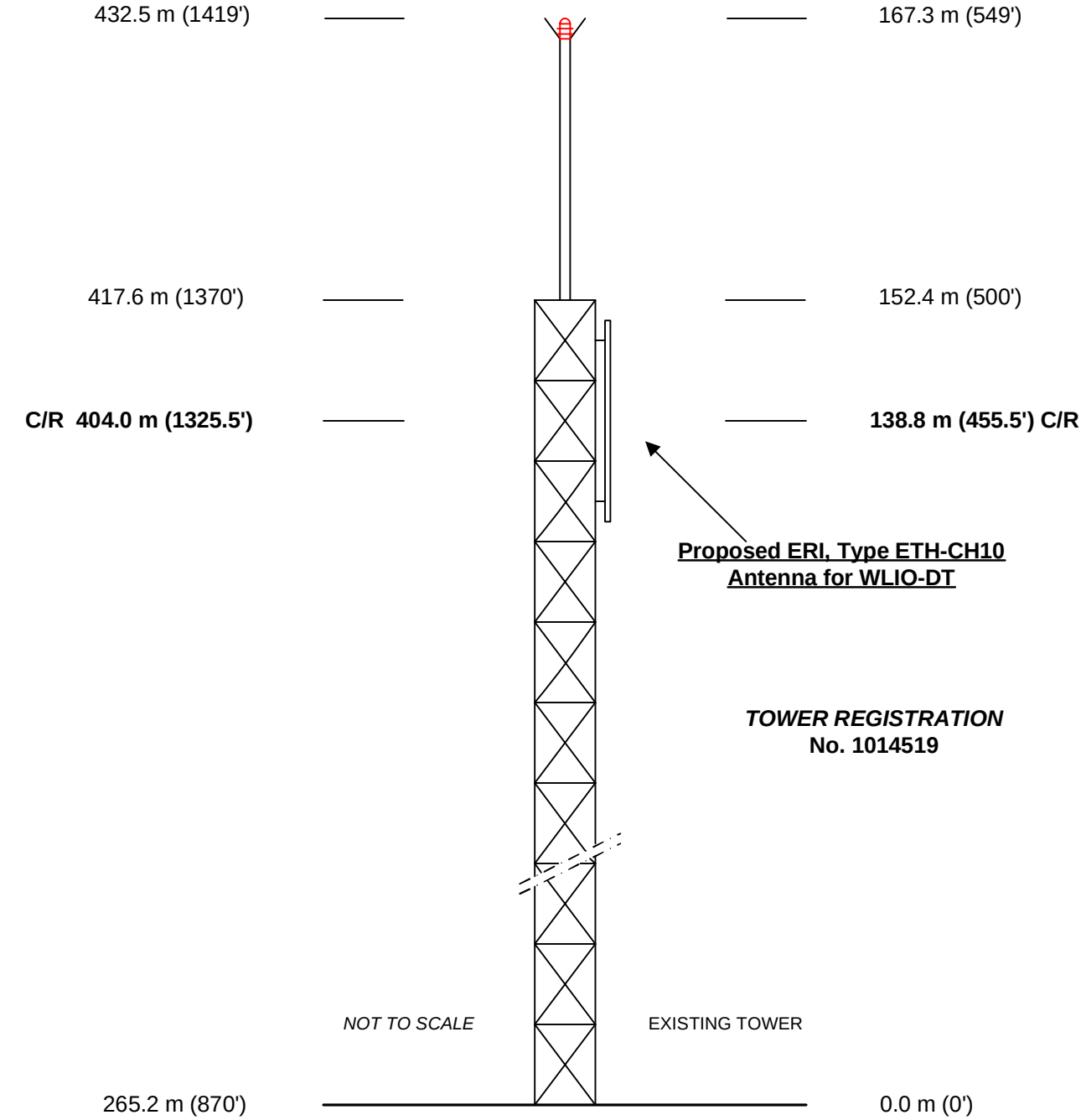


EXHIBIT E - 1
VERTICAL SKETCH
FOR THE PROPOSED DT OPERATION OF
WLIO-DT, LIMA, OHIO
MAY 2006

COHEN, DIPPELL AND EVERIST, P.C.

EXHIBIT E-2

ANTENNA MANUFACTURER DATA

WLIO-DT, LIMA, OHIO

EXHIBIT E-2a

AZIMUTH PATTERN

Type:	CRUCIS-O	
	Numeric	dBd
Directivity:	1.10	0.41
Peak(s) at:		
Polarization:	Horizontal	
Channel:	8 (DTV)	
Location:	Lima, OH	
Note:		

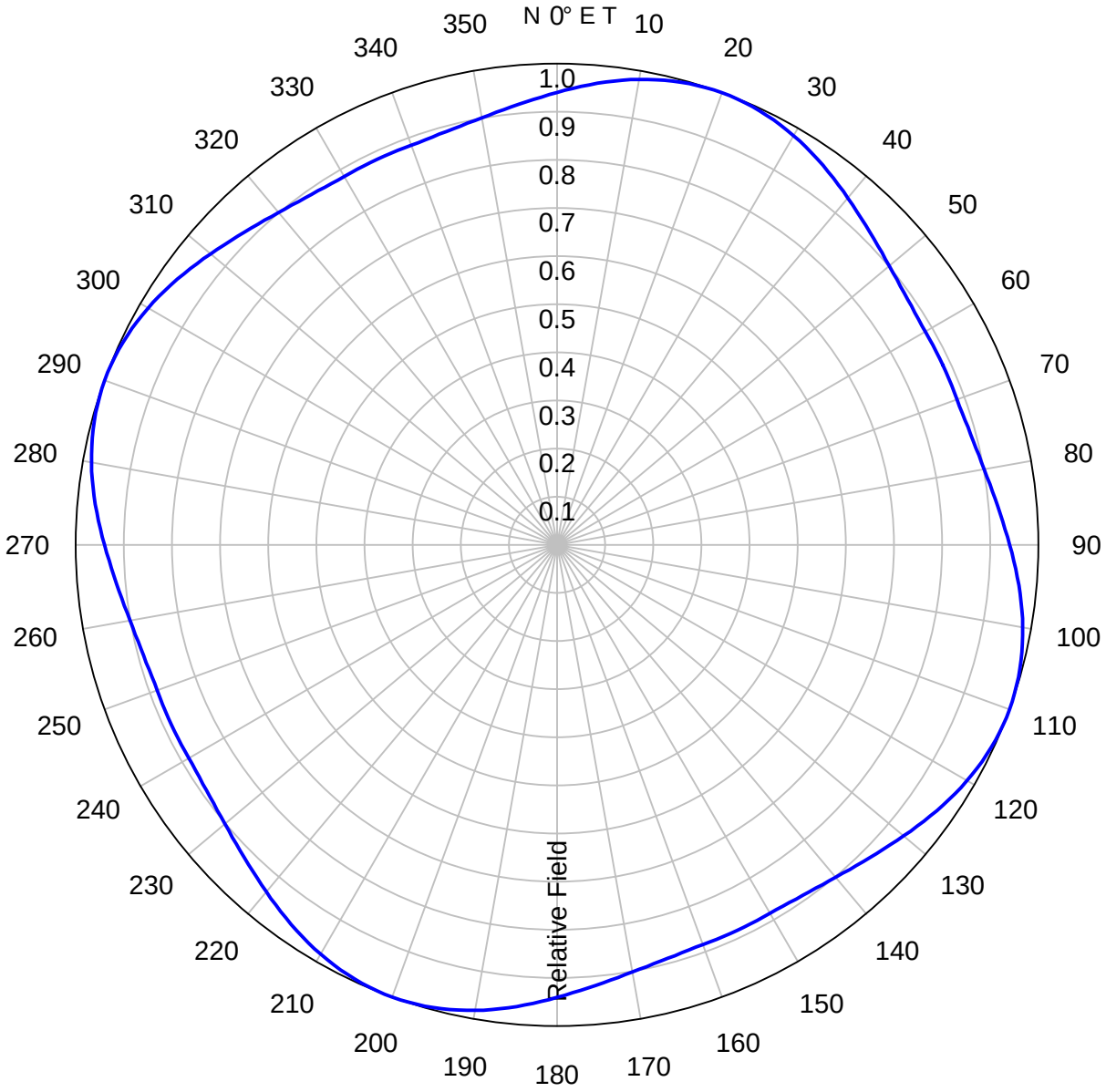


EXHIBIT E-2b

AZIMUTH TABULATED DATA

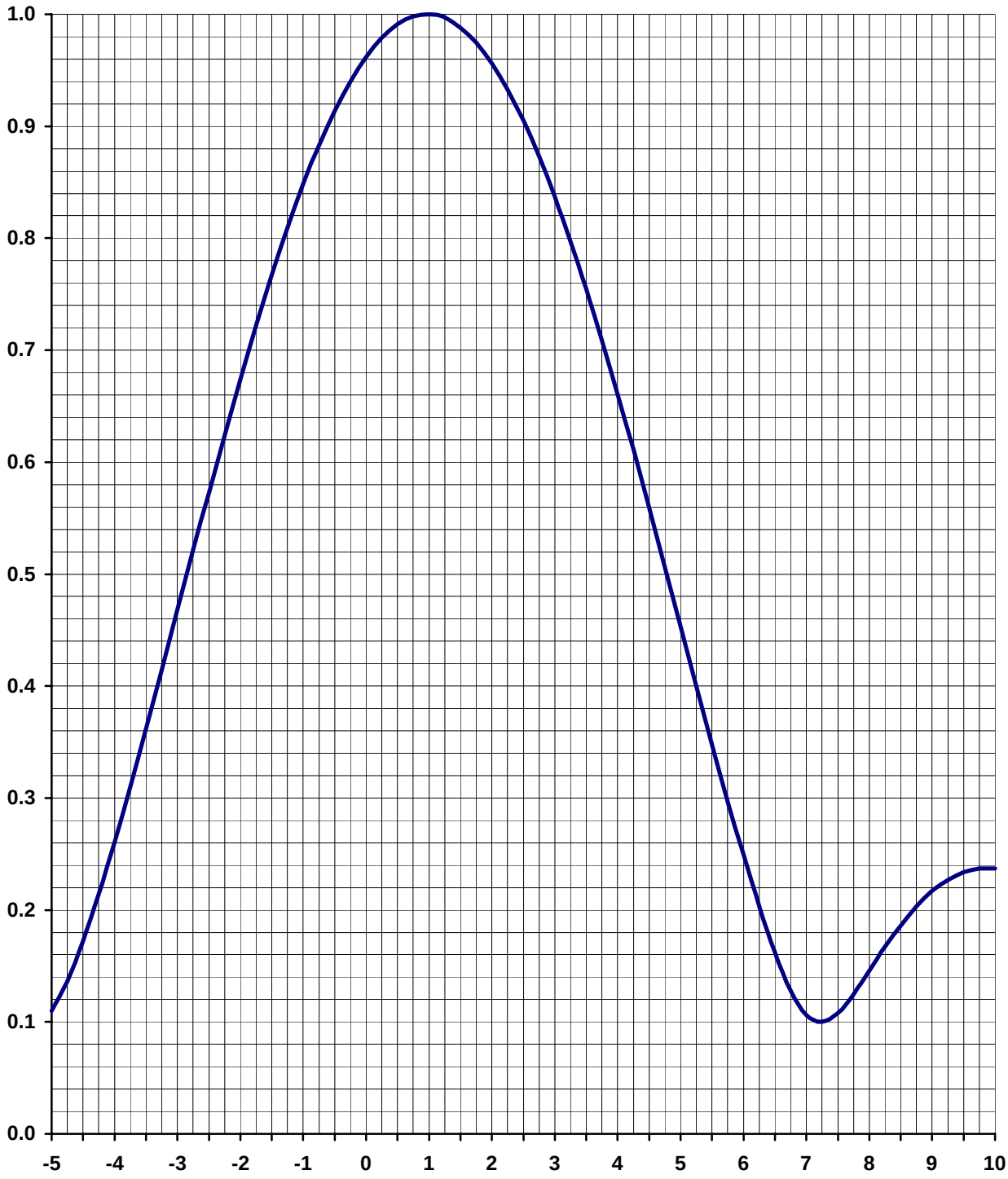
Type: CRUCIS-O

Polarization: Horizontal

Angle	Field	dB	Angle	Field	dB	Angle	Field	dB	Angle	Field	dB
0	0.940	-0.54	92	0.949	-0.45	184	0.958	-0.37	276	0.967	-0.29
2	0.949	-0.45	94	0.958	-0.37	186	0.967	-0.29	278	0.975	-0.22
4	0.958	-0.37	96	0.967	-0.29	188	0.975	-0.22	280	0.982	-0.16
6	0.967	-0.29	98	0.975	-0.22	190	0.982	-0.16	282	0.988	-0.10
8	0.975	-0.22	100	0.982	-0.16	192	0.988	-0.10	284	0.993	-0.06
10	0.982	-0.16	102	0.988	-0.10	194	0.993	-0.06	286	0.997	-0.03
12	0.988	-0.10	104	0.993	-0.06	196	0.997	-0.03	288	0.999	-0.01
14	0.993	-0.06	106	0.997	-0.03	198	0.999	-0.01	290	1.000	0.00
16	0.997	-0.03	108	0.999	-0.01	200	1.000	0.00	292	0.999	-0.01
18	0.999	-0.01	110	1.000	0.00	202	0.999	-0.01	294	0.997	-0.03
20	1.000	0.00	112	0.999	-0.01	204	0.997	-0.03	296	0.993	-0.06
22	0.999	-0.01	114	0.997	-0.03	206	0.993	-0.06	298	0.988	-0.10
24	0.997	-0.03	116	0.993	-0.06	208	0.988	-0.10	300	0.982	-0.16
26	0.993	-0.06	118	0.988	-0.10	210	0.982	-0.16	302	0.975	-0.22
28	0.988	-0.10	120	0.982	-0.16	212	0.975	-0.22	304	0.967	-0.29
30	0.982	-0.16	122	0.975	-0.22	214	0.967	-0.29	306	0.958	-0.37
32	0.975	-0.22	124	0.967	-0.29	216	0.958	-0.37	308	0.949	-0.45
34	0.967	-0.29	126	0.958	-0.37	218	0.949	-0.45	310	0.940	-0.54
36	0.958	-0.37	128	0.949	-0.45	220	0.940	-0.54	312	0.931	-0.62
38	0.949	-0.45	130	0.940	-0.54	222	0.931	-0.62	314	0.923	-0.70
40	0.940	-0.54	132	0.931	-0.62	224	0.923	-0.70	316	0.915	-0.77
42	0.931	-0.62	134	0.923	-0.70	226	0.915	-0.77	318	0.908	-0.84
44	0.923	-0.70	136	0.915	-0.77	228	0.908	-0.84	320	0.901	-0.91
46	0.915	-0.77	138	0.908	-0.84	230	0.901	-0.91	322	0.896	-0.95
48	0.908	-0.84	140	0.901	-0.91	232	0.896	-0.95	324	0.891	-1.00
50	0.901	-0.91	142	0.896	-0.95	234	0.891	-1.00	326	0.888	-1.03
52	0.896	-0.95	144	0.891	-1.00	236	0.888	-1.03	328	0.885	-1.06
54	0.891	-1.00	146	0.888	-1.03	238	0.885	-1.06	330	0.884	-1.07
56	0.888	-1.03	148	0.885	-1.06	240	0.884	-1.07	332	0.884	-1.07
58	0.885	-1.06	150	0.884	-1.07	242	0.884	-1.07	334	0.884	-1.07
60	0.884	-1.07	152	0.884	-1.07	244	0.884	-1.07	336	0.884	-1.07
62	0.884	-1.07	154	0.884	-1.07	246	0.884	-1.07	338	0.884	-1.07
64	0.884	-1.07	156	0.884	-1.07	248	0.884	-1.07	340	0.884	-1.07
66	0.884	-1.07	158	0.884	-1.07	250	0.884	-1.07	342	0.885	-1.06
68	0.884	-1.07	160	0.884	-1.07	252	0.885	-1.06	344	0.888	-1.03
70	0.884	-1.07	162	0.885	-1.06	254	0.888	-1.03	346	0.891	-1.00
72	0.885	-1.06	164	0.888	-1.03	256	0.891	-1.00	348	0.896	-0.95
74	0.888	-1.03	166	0.891	-1.00	258	0.896	-0.95	350	0.901	-0.91
76	0.891	-1.00	168	0.896	-0.95	260	0.901	-0.91	352	0.908	-0.84
78	0.896	-0.95	170	0.901	-0.91	262	0.908	-0.84	354	0.915	-0.77
80	0.901	-0.91	172	0.908	-0.84	264	0.915	-0.77	356	0.923	-0.70
82	0.908	-0.84	174	0.915	-0.77	266	0.923	-0.70	358	0.931	-0.62
84	0.915	-0.77	176	0.923	-0.70	268	0.931	-0.62	360	0.940	-0.54
86	0.923	-0.70	178	0.931	-0.62	270	0.940	-0.54			
88	0.931	-0.62	180	0.940	-0.54	272	0.949	-0.45			
90	0.940	-0.54	182	0.949	-0.45	274	0.958	-0.37			

ELEVATION PATTERN

TYPE:	***ETH-CH10***		***Frequency:***	***8 (DTV)***
Directivity:	***Numeric***	***dBd***	***Location:***	***Lima, OH***
Main Lobe:	***9.74***	***9.89***	***Beam Tilt:***	***1.00***
Horizontal:	***9.01***	***9.55***	***Polarization:***	***Horizontal***

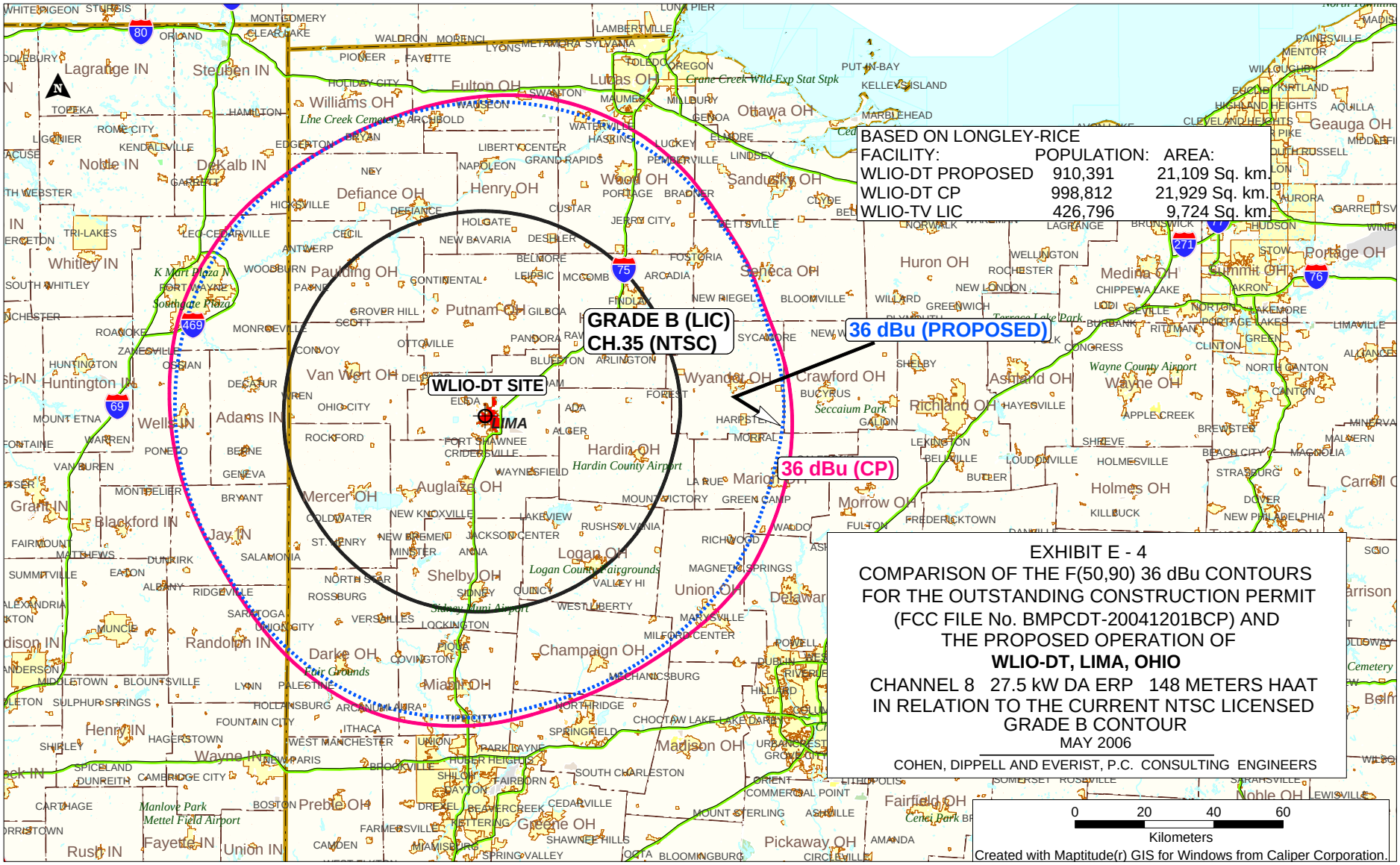


TABULATED DATA FOR ELEVATION PATTERN

ETH-CH10 ***-5 to 10 degrees in 0.25 increments*** ***10 to 90 degrees in 0.50 increments***

ANGLE	FIELD	dB	ANGLE	FIELD	dB	ANGLE	FIELD	dB	ANGLE	FIELD	dB	ANGLE	FIELD	dB
-5.000	0.110	-19.17	6.75	0.128	-17.86	27.00	0.004	-47.96	50.50	0.032	-29.90	74.00	0.231	-12.73
-4.750	0.136	-17.33	7.00	0.106	-19.49	27.50	0.027	-31.37	51.00	0.014	-37.08	74.50	0.227	-12.88
-4.500	0.172	-15.29	7.25	0.100	-20.00	28.00	0.048	-26.38	51.50	0.013	-37.72	75.00	0.222	-13.07
-4.250	0.214	-13.39	7.50	0.108	-19.33	28.50	0.067	-23.48	52.00	0.030	-30.46	75.50	0.216	-13.31
-4.000	0.261	-11.67	7.75	0.125	-18.06	29.00	0.083	-21.62	52.50	0.049	-26.20	76.00	0.209	-13.60
-3.750	0.310	-10.17	8.00	0.146	-16.71	29.50	0.094	-20.54	53.00	0.067	-23.48	76.50	0.202	-13.89
-3.500	0.362	-8.83	8.25	0.167	-15.55	30.00	0.101	-19.91	53.50	0.084	-21.51	77.00	0.195	-14.20
-3.250	0.414	-7.66	8.50	0.186	-14.61	30.50	0.103	-19.74	54.00	0.100	-20.00	77.50	0.187	-14.56
-3.000	0.468	-6.60	8.75	0.203	-13.85	31.00	0.100	-20.00	54.50	0.113	-18.94	78.00	0.179	-14.94
-2.750	0.521	-5.66	9.00	0.217	-13.27	31.50	0.093	-20.63	55.00	0.125	-18.06	78.50	0.171	-15.34
-2.500	0.573	-4.84	9.25	0.227	-12.88	32.00	0.082	-21.72	55.50	0.134	-17.46	79.00	0.163	-15.76
-2.250	0.624	-4.10	9.50	0.234	-12.62	32.50	0.067	-23.48	56.00	0.141	-17.02	79.50	0.155	-16.19
-2.000	0.674	-3.43	9.75	0.237	-12.51	33.00	0.049	-26.20	56.50	0.145	-16.77	80.00	0.147	-16.65
-1.750	0.722	-2.83	10.00	0.237	-12.51	33.50	0.029	-30.75	57.00	0.146	-16.71	80.50	0.140	-17.08
-1.500	0.767	-2.30	10.50	0.228	-12.84	34.00	0.009	-40.92	57.50	0.145	-16.77	81.00	0.133	-17.52
-1.250	0.809	-1.84	11.00	0.207	-13.68	34.50	0.013	-37.72	58.00	0.141	-17.02	81.50	0.127	-17.92
-1.000	0.848	-1.43	11.50	0.177	-15.04	35.00	0.033	-29.63	58.50	0.134	-17.46	82.00	0.121	-18.34
-0.750	0.883	-1.08	12.00	0.140	-17.08	35.50	0.052	-25.68	59.00	0.125	-18.06	82.50	0.116	-18.71
-0.500	0.914	-0.78	12.50	0.098	-20.18	36.00	0.069	-23.22	59.50	0.114	-18.86	83.00	0.112	-19.02
-0.250	0.940	-0.54	13.00	0.057	-24.88	36.50	0.083	-21.62	60.00	0.102	-19.83	83.50	0.108	-19.33
0.000	0.962	-0.34	13.50	0.025	-32.04	37.00	0.093	-20.63	60.50	0.087	-21.21	84.00	0.105	-19.58
0.250	0.979	-0.18	14.00	0.042	-27.54	37.50	0.100	-20.00	61.00	0.072	-22.85	84.50	0.103	-19.74
0.500	0.991	-0.08	14.50	0.074	-22.62	38.00	0.103	-19.74	61.50	0.055	-25.19	85.00	0.101	-19.91
0.750	0.998	-0.02	15.00	0.104	-19.66	38.50	0.102	-19.83	62.00	0.039	-28.18	85.50	0.100	-20.00
1.000	1.000	0.00	15.50	0.126	-17.99	39.00	0.097	-20.26	62.50	0.027	-31.37	86.00	0.100	-20.00
1.250	0.997	-0.03	16.00	0.140	-17.08	39.50	0.088	-21.11	63.00	0.025	-32.04	86.50	0.099	-20.09
1.500	0.988	-0.10	16.50	0.146	-16.71	40.00	0.076	-22.38	63.50	0.037	-28.64	87.00	0.099	-20.09
1.750	0.975	-0.22	17.00	0.143	-16.89	40.50	0.062	-24.15	64.00	0.054	-25.35	87.50	0.099	-20.09
2.000	0.956	-0.39	17.50	0.133	-17.52	41.00	0.045	-26.94	64.50	0.073	-22.73	88.00	0.100	-20.00
2.250	0.933	-0.60	18.00	0.116	-18.71	41.50	0.026	-31.70	65.00	0.091	-20.82	88.50	0.100	-20.00
2.500	0.905	-0.87	18.50	0.094	-20.54	42.00	0.007	-43.10	65.50	0.109	-19.25	89.00	0.100	-20.00
2.750	0.873	-1.18	19.00	0.067	-23.48	42.50	0.014	-37.08	66.00	0.127	-17.92	89.50	0.100	-20.00
3.000	0.837	-1.55	19.50	0.038	-28.40	43.00	0.033	-29.63	66.50	0.143	-16.89	90.00	0.100	-20.00
3.250	0.797	-1.97	20.00	0.012	-38.42	43.50	0.052	-25.68	67.00	0.159	-15.97			
3.500	0.755	-2.44	20.50	0.024	-32.40	44.00	0.069	-23.22	67.50	0.173	-15.24			
3.750	0.709	-2.99	21.00	0.050	-26.02	44.50	0.083	-21.62	68.00	0.186	-14.61			
4.000	0.661	-3.60	21.50	0.073	-22.73	45.00	0.096	-20.35	68.50	0.197	-14.11			
4.250	0.611	-4.28	22.00	0.092	-20.72	45.50	0.105	-19.58	69.00	0.207	-13.68			
4.500	0.559	-5.05	22.50	0.105	-19.58	46.00	0.111	-19.09	69.50	0.216	-13.31			
4.750	0.506	-5.92	23.00	0.113	-18.94	46.50	0.114	-18.86	70.00	0.223	-13.03			
5.000	0.453	-6.88	23.50	0.114	-18.86	47.00	0.114	-18.86	70.50	0.229	-12.80			
5.250	0.400	-7.96	24.00	0.110	-19.17	47.50	0.110	-19.17	71.00	0.233	-12.65			
5.500	0.348	-9.17	24.50	0.100	-20.00	48.00	0.103	-19.74	71.50	0.236	-12.54			
5.750	0.297	-10.54	25.00	0.085	-21.41	48.50	0.093	-20.63	72.00	0.237	-12.51			
6.000	0.249	-12.08	25.50	0.066	-23.61	49.00	0.081	-21.83	72.50	0.238	-12.47			
6.250	0.203	-13.85	26.00	0.045	-26.94	49.50	0.066	-23.61	73.00	0.236	-12.54			
6.500	0.162	-15.81	26.50	0.021	-33.56	50.00	0.050	-26.02	73.50	0.234	-12.62			


NOISE-LIMITED
CITY GRADE
WLIO-DT SITE
LIMA
EXHIBIT E - 3
COMPUTED F(50,90) CITY GRADE 43 dBu AND
NOISE-LIMITED 36 dBu CONTOURS FOR
THE PROPOSED OPERATION OF
WLIO-DT, LIMA, OHIO
CHANNEL 8 27.5 kW DA ERP 148 METERS HAAT
MAY 2006
COHEN, DIPPELL AND EVERIST, P.C. CONSULTING ENGINEERS
0 20 40 60
Kilometers
Created with Maptitude(r) GIS for Windows from Caliper Corporation.


BASED ON LONGLEY-RICE
FACILITY: POPULATION: AREA:
WLIO-DT PROPOSED 910,391 21,109 Sq. km.
WLIO-DT CP 998,812 21,929 Sq. km.
WLIO-TV LIC 426,796 9,724 Sq. km.
GRADE B (LIC)
CH.35 (NTSC)
36 dBu (PROPOSED)
36 dBu (CP)
WLIO-DT SITE
LIMA
EXHIBIT E - 4
COMPARISON OF THE F(50,90) 36 dBu CONTOURS
FOR THE OUTSTANDING CONSTRUCTION PERMIT
(FCC FILE No. BMPCDT-20041201BCP) AND
THE PROPOSED OPERATION OF
WLIO-DT, LIMA, OHIO
CHANNEL 8 27.5 kW DA ERP 148 METERS HAAT
IN RELATION TO THE CURRENT NTSC LICENSED
GRADE B CONTOUR
MAY 2006
COHEN, DIPPELL AND EVERIST, P.C. CONSULTING ENGINEERS
0 20 40 60
Kilometers
Created with Maptitude(r) GIS for Windows from Caliper Corporation.

SECTION III-D - DTV Engineering

Complete Questions 1-5 of the Certification Checklist and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.

Certification Checklist: A correct answer of "Yes" to all of the questions below will ensure an expeditious grant of a construction permit. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be requird prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.

1. The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:

   (a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622. [X] Yes [ ] No

   (b) It will operate from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this station as established in 47 C.F.R. Section 73.622. [X] Yes [ ] No

   (c) It will operate with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622. [X] Yes [ ] No

2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. [X] Yes [ ] No

   Applicant must **submit the Exhibit** called for in Item 13.

3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community. [X] Yes [ ] No

4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable. [X] Yes [ ] No

5. The antenna structure to be used by this facility has been registered by the Commission and will not require reregistration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7. [X] Yes [ ] No

SECTION III-D DTV Engineering

TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1. Channel Number: DTV 8 Analog TV, if any 35

2. Zone: [X] I [ ] II [ ] III

3. Antenna Location Coordinates: (NAD 27)

40 ° 44 ' 51 " [X] N [ ] S Latitude

84 ° 07 ' 54.5 " [ ] E [X] W Longitude

4. Antenna Structure Registration Number: 1014519

[ ] Not applicable [ ] FAA Notification Filed with FAA

5. Antenna Location Site Elevation Above Mean Sea Level: 265.2 meters

6. Overall Tower Height Above Ground Level: 167.3 meters

7. Height of Radiation Center Above Ground Level: 138.8 meters

8. Height of Radiation Center Above Average Terrain: 148 meters

9. Maximum Effective Radiated Power (average power): 27.5 kW

10. Antenna Specifications:

a.

Manufacturer	Model
ERI	ETH-CH10-8

b. Electrical Beam Tilt: 1.0 degrees [ ] Not Applicable

c. Mechanical Beam Tilt: _____ degrees toward azimuth _____ degrees True [X] Not Applicable

Attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c). Exhibit No. E-2

d. Polorization: [X] Horizontal [ ] Circular [ ] Elliptical

TECH BOX

e. Directional Antenna Relative Field Values: ☐ Not applicable (Nondirectional)

Rotation: _____ ° ☒ No rotation

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0	0.940	60	0.884	120	0.982	180	0.940	240	0.884	300	0.982
10	0.982	70	0.884	130	0.940	190	0.982	250	0.884	310	0.940
20	1.000	80	0.901	140	0.901	200	1.000	260	0.901	320	0.901
30	0.982	90	0.940	150	0.884	210	0.982	270	0.940	330	0.884
40	0.940	100	0.982	160	0.884	220	0.940	280	0.982	340	0.884
50	0.901	110	1.000	170	0.901	230	0.901	290	1.000	350	0.901
Additional Azimuths											

If a directional antenna is proposed, the requirements of 47 C.F.R. Section 73.625(c) must be satisfied. **Exhibit required.**

Exhibit No. E-2

11. Does the proposed facility satisfy the interference protection provisions of 47 C.F.R. Section 73.623(a)? (Applicable only if **Certification Checklist** Items 1(a), (b), or (c) are answered "No.") ☒ Yes ☐ No

If "No," attach as an Exhibit justification therefor, including a summary of any related previously granted waivers.

Exhibit No. N/A

12. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefor. (Applicable only if **Certification Checklist** Item 3 is answered "No.")

Exhibit No. N/A

13. **Environmental Protection Act. Submit in an Exhibit** the following:

Exhibit No. E

a. If **Certification Checklist** Item 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.

By checking "Yes" to **Certification Checklist** Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R. Section 1.1311.

PREPARER'S CERTIFICATION IN SECTION III MUST BE COMPLETED AND SIGNED.

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing	Typed or Printed Title of Person Signing
Signature	Date

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name Martin R. Doczkat		Relationship to Applicant (e.g., Consulting Engineer) Consulting Engineer
Signature 		Date May 9, 2006
Mailing Address Cohen, Dippell and Everist, P.C., 1300 L Street, NW, Suite 1100		
City Washington	State or Country (if foreign address) DC	ZIP Code 20005
Telephone Number (include area code) (202) 898-0111	E-Mail Address (if available) cde@attglobal.net	

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